

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DIXON HUGHES GOODMAN LLP,

Plaintiff,

v.

KURT SALMON US, INC.,

Defendant.

Civil Action File No.
1:14-cv-1439-WSD

DEFENDANT KURT SALMON US, INC.'S CONSENT MOTION
TO EXTEND TIME TO RESPOND TO THE COMPLAINT

COMES NOW Defendant Kurt Salmon US, Inc. ("Kurt Salmon") and moves the Court to extend its time to file its response to the Complaint filed by Plaintiff Dixon Hughes Goodman LLP. Counsel for Plaintiff has given his consent to the relief requested in this Motion. In support of the Motion, Kurt Salmon shows the Court as follows:

1.

This matter was transferred to this Court on May 13, 2014, following the Middle District of North Carolina's determination that it lacked personal jurisdiction over Kurt Salmon. [Docket Nos. 13, 14.]

2.

Also on May 13, 2014, this Court issued an Order directing Kurt Salmon to submit proof of DHG's citizenship by May 30, 2014, to show that subject matter jurisdiction exists for this case. [Docket No. 15.]

3.

Kurt Salmon has been in contact with counsel for DHG in order to obtain information regarding its citizenship and will respond to the Court's Order by May 30, 2014.

4.

In the meantime, pursuant to Fed. R. Civ. P. 12 (a)(4)(A), Kurt Salmon calculated its deadline to respond to the Complaint as today, May 27, 2014.

5.

Kurt Salmon hereby seeks an extension of its deadline to respond to the Complaint. Specifically, Kurt Salmon requests a deadline that follows the Court's issuance of a ruling on its subject matter jurisdiction over the case.

6.

Counsel for Kurt Salmon contacted opposing counsel by telephone and by email this morning regarding its position on this Motion. Counsel for Dixon Hughes, Mr. Scott Wyatt, provided that consent.

WHEREFORE, Kurt Salmon respectfully requests that the Court extend its deadline to respond to the Complaint until seven (7) days following the Court's anticipated order regarding subject matter jurisdiction. For the Court's convenience, a proposed order is attached hereto as Exhibit A.

This 27th day of May, 2014.

ALSTON & BIRD LLP

/s/Molly Jones

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Attorneys for Kurt Salmon US, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing DEFENDANT KURT SALMON US, INC.'S CONSENT MOTION TO EXTEND TIME TO RESPOND TO THE COMPLAINT on the following counsel of record via U.S. Mail:

Scott F. Wyatt
Kim Bauman
WYATT EARLY HARRIS WHEELER, LLP
Post Office Drawer 2086
High Point, NC 27261-2086

This 27th day of May, 2014.

/s/ Molly Jones

Molly Jones

Georgia Bar No. 744294